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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff,

v.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-06754-WHA

**SONOS, INC.'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

I. INTRODUCTION

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Sonos, Inc. (“Sonos”) hereby requests to file under seal the entirety of Exhibit 1 to the Declaration of Geoffrey Moss in support of Sonos, Inc.’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R.3-6.

DOCUMENT	PORTIONS TO BE SEAL	DESIGNATING PARTY
Exhibit 1 to the Declaration of Geoffrey Moss in support of Sonos, Inc.’s Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6	Entire document	Google

II. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). *See* Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

III. GOOGLE’S CONFIDENTIAL INFORMATION

Sonos seeks to seal the document because Google, LLC (“Google”) has designated the information Confidential and/or Highly Confidential-Attorneys’ Eyes Only and/or Highly Confidential-Source Code pursuant to the Protective Order (Dkt. 92). *See* Declaration of Cole B. Richter in Support of Administrative Motion filed concurrently herewith, ¶ 2. Sonos takes no position on the merits of sealing Google’s designated material, and expects Google to file one or more declarations in accordance with the Local Rules.

IV. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above-listed document accompany this Administrative Motion. For the foregoing reasons, Sonos respectfully requests that the Court grant Sonos’s Administrative Motion.

1 Dated: February 7, 2022

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3 By: /s/ Cole B. Richter

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